

IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT NORTH CAROLINA

IN RE:

Christian Daniel Soria  
Belkis Alexandra Soria  
Debtor(s)

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)  
)  
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Case #15-50881C-13

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OBJECTION TO NOTICE OF MORTGAGE PAYMENT CHANGE  
AND FOR ATTORNEY FEES

COME the Debtors through counsel and hereby objects to Notice of Mortgage Payment Change ("Notice") on claim number 5 (Standing Trustee's claim numbers 1 and 85) filed by North Carolina Housing Finance ("Creditor") in Debtors' Chapter 13 plan and would respectfully show the following:

1. On June 28, 2018, Creditor filed a Notice of Mortgage Payment Change indicating the mortgage payment was increasing from \$716.12 to \$814.57 due to increased escrow requirements.
2. Debtors do not believe there has been enough of an increase in property taxes or the insurance premium to warrant such a significant increase.
3. Debtors' counsel has expended time working with the Debtor and preparing this objection.

THEREFORE, the Debtor(s) request

1. That the increase in monthly mortgage payments not be allowed.
2. That Debtors' counsel be awarded attorney fees in the amount of \$350.00, the presumptive fee for work involved with an objection to mortgage claim.

This 11<sup>th</sup> day of July, 2018.

/s/ Wendell "Wes" Schollander, III  
Wendell "Wes" Schollander, III, NCSB #28062  
Schollander Law Offices, 336-727-0900  
2000 W. First Street, Suite 308  
Winston-Salem, NC 27104

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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served the foregoing pleading upon all other parties to this cause by depositing a copy thereof in a postpaid wrapper in a post office or official depository under the exclusive care and custody of the United States Postal Service properly addressed as follows or by the court's electronic noticing service:

Christian and Belkis Soria  
1635 Thompson Drive  
Winston Salem NC 27127

North Carolina Housing Finance Agency  
c/o SN Servicing Corporation  
323 5<sup>th</sup> Street  
Eureka CA 95501

North Carolina Housing Finance Agency  
Attn: Officer or Managing Agent  
3508 Bush Street  
Raleigh NC 27609

John W. Fletcher, III, Attorney  
Henderson Nystrom Fletcher & Tydings PLLC  
831 East Morehead St, Ste 255  
Charlotte NC 28202

Kathryn L. Bringle, Standing Trustee  
Chapter 13 Office  
P.O. Box 2115  
Winston-Salem, NC 27102

This 11<sup>th</sup> day of July, 2018.

/s/ Wendell "Wes" Schollander, III  
Wendell "Wes" Schollander, III, NCSB #28062  
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2000 W. First Street, Suite 509  
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